

MEMO ENDORSED



U.S. Department of Justice
Damian Williams
United States Attorney
Southern District Of New York
Civil Division

c/o Office of Program Litigation, Office II (212) 264-0981
Office of the General Counsel padma.ghatage@ssa.gov
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235

VIA CM/ECF

February 5, 2025

Hon. Victoria Reznik
United States Magistrate Judge
United States District Court for the
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: *McCall v. Acting Commissioner of Social Security*, No. 7:24-cv-07980-JGLC-VR
Request for Extension of Deadlines

Dear Judge Moses:

This Office represents the Acting Commissioner of Social Security (Commissioner), the Defendant in this matter. We write respectfully to request an extension of the deadlines for filing the Defendant's brief in the above-referenced Social Security case, pursuant to the Standing Order, *In re Briefing of Social Security Cases*, M 10-46, issued on November 18, 2022 (the Standing Order).

Pursuant to the Supplemental Rules for Social Security Actions effective December 1, 2022, Defendant's brief is due on February 21, 2025. *See* Supp. R 4, 6-8. Due to large workloads, Defendant respectfully requests that the Court approve the following proposed schedule:

- Defendant's brief shall be filed by March 31, 2025; and
- Plaintiff's reply shall be filed by April 14, 2025.

This is Defendant's first request for an extension of the deadlines in this case.

In accordance with the standing order, my co-counsel, Special Assistant U.S. Attorney Karen G. Fiszer reached out to the *pro se* Plaintiff by email on January 31, 2025 to request consent to this extension but has received no response.

We thank the Court for its consideration of this request.

Respectfully,

DANIELLE R. SASSOON
United States Attorney

By: s/ Padma Ghatage
Padma Ghatage
Special Assistant United States Attorney
c/o Office of Program Litigation, Office II
Office of the General Counsel
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Tel.: (212) 264-0981
Email: padma.ghatage@ssa.gov
Attorneys for Defendant

cc: Kristen McCall, Plaintiff, Pro Se (by US Mail)

Defendant's request to extend the briefing schedule is **GRANTED**. Defendant's brief is now due March 31, 2025. Plaintiff's reply--if any--is now due April 14, 2025. The Clerk of Court is respectfully directed to close out the gavel associated with ECF No. 20.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 2-6-25